

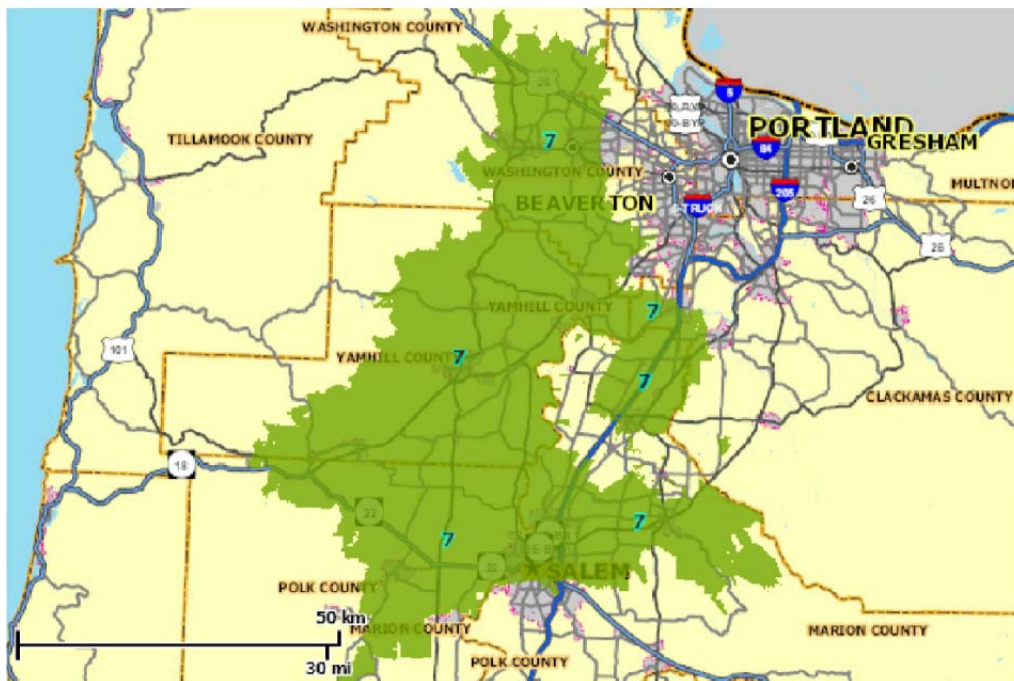
1305 NE Lafayette Ave, McMinnville OR 97128
www.onlinenw.com 503.883.9200

December 28, 2017

Via ECFS
Marlene H. Dortch, Secretary
Federal Communications Commission
RE: GN Docket No. 17-258
445 12th Street, S.W.
Washington, D.C. 20554

Dear Ms. Dortch

Our company, OnlineNW, was started in 1997. We are a small business with 32 employees, providing Fixed wireless Internet Service to more than 4000 rural customers throughout 5 counties in the state of Oregon. We began building our wireless network in 2004 using 900 MHz unlicensed spectrum. Since then we have expanded our network using the 2.4 GHz, 3.65 GHz and 5 GHz spectrum for unlicensed or light licensed broadband devices. The CBRS band is important to the future of our business and the additional spectrum is needed to allow us to expand our network and provide higher speed offerings to our customers. Today, we often have to turn customers away due to lack of available spectrum and capacity issues. The maps below show the current coverage areas of our Fixed Wireless Network.





A change in the CBRS auction rules to increase the size of PALs to PEAs would make it virtually impossible for OnlineNW to participate in an auction and significantly reduce our ability to service rural customers. The current PEA map shows that we would have to obtain licensing in 2 areas, which include 3 large cities closest to our network, Portland, Salem and Eugene. All of these cities have extensive cable and fiber options from the large national providers. Fixed wireless Internet has no market in these areas and likewise, the national carriers have no interest in building out their services to the very rural areas that we serve. Using census tracts is the only method that would financially allow wireless service providers like us to bid on spectrum.

OnlineNW needs the increased CBRS mid-band spectrum as a solution to provide more service to rural customers who currently have limited or no high-speed options. In many areas of our service footprint we are currently unable to provide service due to topographical limitations. The 3550-3560 bands have excellent near line of sight capabilities. The additional 100MHz of spectrum will go a long way toward delivering the capacity to the areas that need it the most. Clean spectrum is critically important in order to deliver reliable service and meet increased capacity needs of our customers. OnlineNW has already invested more than one million dollars in hardware and labor for the 3650-3700 MHz relying on the rules adopted after April of 2015. We are prepared financially to deploy new 3550-3560 band equipment on existing towers and provide service to many new residential and business customers that we are currently unable to serve.

Please do not change the current rules which benefit small business and allow for both small and large providers the equal opportunity to serve the needs of all customers both urban and rural. We have worked for over 20 years to provide quality service to the rural areas of our state. Please help us continue our efforts by keeping the PAL auctions based on census tracts.

Thank you for your consideration,

Kathy Tate
CEO – OnlineNW & XS Media